

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>LISANDRA GONZALEZ, individually and on behalf of all persons similarly situated,</b>	:	<b>CASE NO.: 2:17-CV-1319</b>
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>COLLECTIVE AND CLASS ACTION</b>
	:	
<b>VERITAS CONSULTANT GROUP, LLC, d/b/a MORAVIA HEALTH NETWORK,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

**PLAINTIFF’S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF THE SETTLEMENT AGREEMENT**

Plaintiff Lisandra Gonzalez, through her undersigned counsel, respectfully moves this Court for an Order:

1. Granting preliminary approval of the Parties’ Settlement Agreement, a true and correct copy of which is attached as Exhibit 1 to this Motion;
2. For settlement purposes, preliminarily certifying the state law claims as a Fed. R. Civ. P. 23 class on behalf of the Settlement Class;
3. Preliminarily approving Plaintiff Lisandra Gonzalez as the Representative of the Settlement Class;
4. Preliminarily approving Berger & Montague P.C. and Montgomery McCracken Walker & Rhoads LLP as Class Counsel for the Settlement Class;
5. Preliminarily approving Angeion Group as Settlement Administrator and preliminarily approving the costs of claims administration;

6. Approving the Notice of Settlement, a true and correct copy in English of which is attached as Exhibit A to the Settlement Agreement, which will be distributed in both English and Spanish; and

7. Approving the proposed schedule and procedure for completing the final approval process as set forth in the Parties' Settlement Agreement.

This Motion is based on the accompanying Memorandum of Law, the Declaration of Sarah Schalman-Bergen in Support of the Plaintiff's Unopposed Motion for Preliminary Approval of the Settlement Agreement, the attached Exhibits, and all other records, pleadings and papers on file in this action. Pursuant to the terms of the Settlement Agreement, Defendant does not oppose this Motion.

A proposed Order is submitted for the Court's consideration.

Dated: November 15, 2018

Respectfully submitted,

BERGER MONTAGUE PC

s/ Sarah R. Schalman-Bergen

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*Attorneys for Plaintiff and Settlement Class  
Members*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through the Court's ECF system this 15th day of November 2018.

s/ Sarah Schalman-Bergen

Sarah R. Schalman-Bergen